

Exhibit 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LISAMARIA MARTINEZ,
Plaintiff,

vs.

COUNTY OF ALAMEDA, MELISSA WILK,
in her individual capacity, EVA HE,
in her individual capacity, MARIA
LAURA BRIONES, in her individual
capacity,

Defendants.

Case No.
20-cv-06570-TSH

CERTIFIED COPY

VOLUME I
VIDEOTAPED REMOTE
DEPOSITION OF LISAMARIA MARTINEZ
Wednesday, March 23, 2022

REPORTED BY:

DEBRA J. SKAGGS, CSR 7857

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12:55:19 1 you recall if that was called a "Go Back Letter"? Does
12:55:22 2 that ring any bells?
12:55:24 3 A. Absolutely no idea. She didn't --
12:55:26 4 Q. Okay.
12:55:26 5 A. -- read anything or tell me. She just said
12:55:28 6 "Here, I wrote you something; go home and have someone
12:55:32 7 help you fill it out."
12:55:35 8 Q. Did you ever access the Go Back Letter
12:55:38 9 yourself?
12:55:42 10 A. What do you mean by access it myself?
12:55:45 11 Q. Yeah. So going back to what we talked about
12:55:47 12 earlier. So what I want to know, basically, is have
12:55:50 13 you -- was there any point that you took steps to figure
12:55:53 14 out what the Go Back Letter said? Did you load it in to
12:55:56 15 your screen access software and review it?
12:55:59 16 A. I got it.
12:56:03 17 I ended up using my husband as my --
12:56:12 18 MR. ELIA: Okay -- objection; calls for
12:56:14 19 communications that are privileged.
12:56:23 20 So don't answer.
12:56:28 21 THE WITNESS: Okay.
12:56:31 22 Ooo, does that mean I can say "I plead the
12:56:34 23 Fifth"?
12:56:35 24 MR. FINE: Q. So I don't want to know
12:56:36 25 about your communications with your husband.

12:56:37 1 A. Okay.

12:56:38 2 Q. But if you could just answer my question,
12:56:40 3 then -- well -- no, I guess it's really irrelevant.

12:56:52 4 I don't want to know about the contents of
12:56:53 5 your communications with your husband. But is it fair
12:56:56 6 to say that at some point you became aware of the
12:56:58 7 contents of the Go Back Letter?

12:57:02 8 A. Yes.

12:57:04 9 Q. And that's specifically referring to the
12:57:07 10 letter that Laura provided you on March 29, 2019, in the
12:57:10 11 CRO; is that correct?

12:57:15 12 A. I'm sorry. A very loud truck just ran by.
12:57:19 13 Can you repeat your question?

12:57:21 14 Q. Not a problem.

12:57:22 15 And that's referring specifically to the
12:57:25 16 letter that Laura provided you on March 29, 2019, in the
12:57:29 17 CRO; is that correct?

12:57:34 18 A. And you're asking if that letter made me aware
12:57:38 19 of what I needed to do?

12:57:39 20 Q. No.

12:57:40 21 So in my prior question I referenced the Go
12:57:42 22 Back Letter, and I just --

12:57:43 23 A. Yes.

12:57:43 24 Q. -- right. And you said that at some point you
12:57:46 25 became aware of the contents of that letter.

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CERTIFICATE OF REPORTER

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I, DEBRA J. SKAGGS, hereby certify that the witness in the foregoing deposition was by me remotely duly sworn to tell the truth, the whole truth, and nothing but the truth in the within-entitled cause;

That said deposition was taken in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true, and correct report of said deposition and of the proceedings which took place;

That I am a disinterested person to the said action.

IN WITNESS WHEREOF, I have hereunto set my hand this 11th day of April, 2022.



DEBRA J. SKAGGS, CSR No. 7857

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